

1 **WEIL, GOTSHAL & MANGES LLP**

2 Stephen Karotkin (*pro hac vice*)  
(stephen.karotkin@weil.com)  
3 Ray C. Schrock, P.C. (*pro hac vice*)  
(ray.schrock@weil.com)  
4 Jessica Liou (*pro hac vice*)  
(jessica.liou@weil.com)  
5 Matthew Goren (*pro hac vice*)  
(matthew.goren@weil.com)  
6 New York, NY 10153-0119  
7 Tel: (212) 310-8000  
Fax: (212) 310-8007

8 **KELLER & BENVENUTTI LLP**

9 Tobias S. Keller (#151445)  
(tkeller@kellerbenvenutti.com)  
10 Jane Kim (#298192)  
(jkim@kellerbenvenutti.com)  
11 650 California Street, Suite 1900  
San Francisco, CA 94108  
12 Tel: (415) 496-6723  
Fax: (415) 636-9251

13 *Attorneys for Debtors  
and Debtors in Possession*

14 **UNITED STATES BANKRUPTCY COURT**

15 **NORTHERN DISTRICT OF CALIFORNIA**

16 **SAN FRANCISCO DIVISION**

17 **In re:**

18 **PG&E CORPORATION,**

19 **- and -**

20 **PACIFIC GAS AND ELECTRIC  
COMPANY,**

21 **Debtors.**

22  Affects PG&E Corporation  
23  Affects Pacific Gas and Electric Company  
24  Affects both Debtors

25 \* *All papers shall be filed in the lead case,  
26 No. 19-30088 (DM)*

27 Case No. 19-30088 (DM)  
Chapter 11

(Lead Case)  
(Jointly Administered)

28 **NOTICE OF AGENDA FOR  
APRIL 23, 2019 1:30 P.M.  
OMNIBUS HEARING**

Date: April 23, 2019  
Time: 1:30 a.m. (Pacific Time)  
Place: United States Bankruptcy Court  
Courtroom 17, 16<sup>th</sup> Floor  
San Francisco, CA 94102

**PROPOSED AGENDA FOR  
APRIL 23, 2019 1:30 P.M. (PACIFIC TIME)  
OMNIBUS HEARING**

**I. MATTERS SCHEDULED TO BE HEARD IN MAIN CASE: No. 19-30088 (DM)**

## ***CONTESTED MATTERS GOING FORWARD***

1. **STIP Motion:** Corrected Motion of Debtors Pursuant to 11 U.S.C. §§ 105(a), 363, and 503(c) for Entry of an Order (I) Approving Short-Term Incentive Plan and (II) Granting Related Relief [Dkt. 806].

Response Deadline: March 20, 2019, at 4:00 p.m. (Pacific Time), except for the following parties, for whom the response deadline was extended by order or by stipulation and order to March 28, 2019, at 4:00 p.m. (Pacific Time):

- Official Tort Claimants Committee
- Official Creditors Committee
- Ad Hoc Committee of Senior Unsecured Noteholders
- ESC Local 20
- The Office of the United States Trustee
- SLF Wildfire Claimants

Responses Filed:

- A. Initial Objection of the Official Committee of Tort Claimants to Motion of Debtors Pursuant to 11 U.S.C. §§ 105(a), 363, and 503(c) for Entry of an Order (I) Approving Short-Term Incentive Plan and (II) Granting Related Relief [Dkt. 847].
- B. Letter to the Court from James M. Eaneman, Sr. [Dkt. 886].
- C. Joinder of the City and County of San Francisco to Initial Objection of the Official Committee of Tort Claimants to Motion of Debtors Pursuant to 11 U.S.C. §§ 105(a), 363, and 503(c) for Entry of an Order (I) Approving Short-Term Incentive Plan and (II) Granting Related Relief (filed by SLF Fire Victim Claimants) [Dkt. 968].
- D. Objection of SLF Fire Victim Claimants to Corrected Motion of Debtors Pursuant to 11 U.S.C. §§ 105(a), 363, and 503(c) for Entry of an Order (I) Approving Short-Term Incentive Plan and (II) Granting Related Relief [Dkt. 1040].
- E. United States Trustee's Objection to Motion of Debtors for Entry of an Order Approving Short-Term Incentive Plan [Dkt. 1044].
- F. Joinder in the Initial Objection of the Official Committee of Tort Claimants to Motion of Debtors Pursuant to 11 U.S.C. §§ 105(a), 363, and 503(c) for Entry of an Order (I) Approving Short-Term Incentive Plan and (II) Granting Related Relief (filed by Interested Party Plaintiffs Executive Committee appointed by the Superior Court of the State of California, in

1 and for the County of Alameda, in Case No. RG16843631 and related  
2 cases) [Dkt. 1054].

3 G. ESC Local 20's Response to the Debtors' Motion for Entry of an Order  
4 Approving Short-Term Incentive Plan and Granting Related Relief [Dkt.  
5 1107].

6 H. Limited Objection of the Official Committee of Unsecured Creditors to  
7 Corrected Motion of Debtors Pursuant to 11 U.S.C. §§ 105(a), 363, and  
8 503(c) for Entry of an Order (I) Approving Short-Term Incentive Plan and  
9 (II) Granting Related Relief [Dkt. 1110].

10 I. Joinder in Objection of SLF Fire Victim Claimants to Corrected Motion of  
11 Debtors Pursuant to 11 U.S.C. §§ 105(a), 363, and 503(c) for Entry of an  
12 Order (I) Approving Short-Term Incentive Plan and (II) Granting Related  
13 Relief (filed by Creditors Ponderosa Pest & Weed Control, Chico Rent-A-  
14 Fence, Gabriella's Eatery, Estafania Miranda, Jedidiah Herndon, Gabriella  
15 Herndon, Julia Herndon, David Herndon) [Dkt. 1111].

16 J. Opposition of the Official Committee of Tort Claimants to Corrected  
17 Motion of Debtors Pursuant to 11 U.S.C. §§ 105(a), 363, and 503(c) for  
18 Entry of an Order (I) Approving Short-Term Incentive Plan and (II)  
19 Granting Related Relief [Dkt. 1109].

20 a. Declaration of Catherine E. Woltering in Support of Opposition to  
21 Corrected Motion of Debtors Pursuant to 11 U.S.C. §§ 105(a), 363,  
22 and 503(c) for Entry of an Order (I) Approving Short-Term Incentive  
23 Plan and (II) Granting Related Relief [Dkt. 1112].

24 b. Declaration of Steven M. Campora in Support of Opposition to  
25 Corrected Motion of Debtors Pursuant to 11 U.S.C. §§ 105(a), 363,  
26 and 503(c) for Entry of an Order (I) Approving Short-Term Incentive  
27 Plan and (II) Granting Related Relief [Dkt. 1113].

28 K. Letter Objection from Wendy Hopkins [Dkt. 1563].

19 Related Documents:

20 L. Motion of Debtors Pursuant to 11 U.S.C. §§ 105(a), 363, and 503(c) for  
21 Entry of an Order (I) Approving Short-Term Incentive Plan and (II)  
22 Granting Related Relief [Dkt. 782].

23 M. Declaration of Douglas J. Friske in Support of Motion of Debtors Pursuant  
24 to 11 U.S.C. §§ 105(a), 363, and 503(c) for Entry of an Order (I)  
25 Approving Short-Term Incentive Plan and (II) Granting Related Relief  
26 [Dkt. 783].

27 N. Declaration of Dinyar Mistry in Support of Motion of Debtors Pursuant to  
28 11 U.S.C. §§ 105(a), 363, and 503(c) for Entry of an Order (I) Approving  
Short-Term Incentive Plan and (II) Granting Related Relief [Dkt. 784].

O. Corrected Declaration of Douglas J. Friske in Support of Motion of  
Debtors Pursuant to 11 U.S.C. §§ 105(a), 363, and 503(c) for Entry of an

1 Order (I) Approving Short-Term Incentive Plan and (II) Granting Related  
2 Relief [Dkt. 807].

3 P. Corrected Declaration of Dinyar Mistry in Support of Motion of Debtors  
4 Pursuant to 11 U.S.C. §§ 105(a), 363, and 503(c) for Entry of an Order (I)  
5 Approving Short-Term Incentive Plan and (II) Granting Related Relief  
6 [Dkt. 808].

7 Q. Order Authorizing Oversize Briefing Pursuant to B.L.R. 9013-1(c) for  
8 Opposition of the Official Committee of Tort Claimants to Motion of  
9 Debtors Pursuant to 11 U.S.C. §§ 105(a), 363, and 503(c) for Entry of an  
10 Order (I) Approving Short-Term Incentive Plan and (II) Granting Related  
11 Relief [Dkt. 1106].

12 R. Reply Memorandum of Points and Authorities in Further Support of  
13 Corrected Motion of Debtors Pursuant to 11 U.S.C. §§ 105(a), 363, and  
14 503(c) for Entry of an Order (I) Approving Short-Term Incentive Plan and  
15 (II) Granting Related Relief [Dkt. 1226].

16 S. Reply Declaration of Dinyar Mistry in Further Support of Corrected  
17 Motion of Debtors Pursuant to 11 U.S.C. §§ 105(a), 363, and 503(c) for  
18 Entry of an Order (I) Approving Short-Term Incentive Plan and (II)  
19 Granting Related Relief [Dkt. 1227].

20 T. *Ex Parte* Application for Entry of an Order Supplementing the Record on  
21 the Corrected Motion of Debtors Pursuant to 11 U.S.C. §§ 105(a), 363,  
22 and 503(c) for Entry of an Order (I) Approving Short-Term Incentive Plan  
23 and (II) Granting Related Relief [Dkt. 1272].

24 U. Declaration of Robert A. Julian in Support of *Ex Parte* Application for  
25 Entry of an Order Supplementing the Record on the Corrected Motion of  
26 Debtors Pursuant to 11 U.S.C. §§ 105(a), 363, and 503(c) for Entry of an  
27 Order (I) Approving Short-Term Incentive Plan and (II) Granting Related  
28 Relief [Dkt. 1273].

29 V. Order Authorizing Oversize Briefing for Reply in Support of Corrected  
30 Motion of Debtors Pursuant to 11 U.S.C. §§ 105(a), 363, and 503(c) for  
31 Entry of an Order (I) Approving Short-Term Incentive Plan and (II)  
32 Granting Related Relief [Dkt. 1281].

33 W. Order Supplementing the Record on the Corrected Motion of Debtors  
34 Pursuant to 11 U.S.C. §§ 105(a), 363, and 503(c) for Entry of an Order (I)  
35 Approving Short-Term Incentive Plan and (II) Granting Related Relief  
36 [Dkt. 1282].

37 X. Notice of Resolution of Limited Objection of Official Committee of  
38 Unsecured Creditors to Corrected Motion of Debtors Pursuant to 11  
39 U.S.C. §§ 105(a), 363, and 503(c) for Entry of an Order (I) Approving  
40 Short-Term Incentive Plan and (II) Granting Related Relief [Dkt. 1284].

41 Status: This matter is going forward on a contested basis.

**PLEASE TAKE NOTICE** that copies of any pleadings and other documents filed with the Court and referenced herein can be viewed and/or obtained: (i) by accessing the Court's website at <http://www.canb.uscourts.gov>, (ii) by contacting the Office of the Clerk of the Court at 450 Golden Gate Avenue, San Francisco, CA 94102, or (iii) from the Debtors' notice and claims agent, Prime Clerk LLC, at <https://restructuring.primeclerk.com/pge> or by calling (844) 339-4217 (toll free) for U.S.-based parties; or +1 (929) 333-8977 for International parties or by e-mail at: [pgeinfo@primeclerk.com](mailto:pgeinfo@primeclerk.com). Note that a PACER password is needed to access documents on the Bankruptcy Court's website.

Dated: April 22, 2019

WEIL, GOTSHAL & MANGES LLP

## **KELLER & BENVENUTTI LLP**

By: /s/ *Jane Kim*

Jane Kim  
*Attorneys for Debtors and  
Debtors in Possession*

**Weil, Gotshal & Manges LLP**  
767 Fifth Avenue  
New York, NY 10153-0119